

CC Docket 98-67

DA 05-1175 – Reply Comment

I hereby submit my reply comment on NATIONAL EXCHANGE CARRIER ASSOCIATION (NECA)'s proposal. I am uncertain about the proposed rates NECA calculated based on but I express my concern whether they incorporated the data by applying the rating methodology devised only from one major provider with 60% of the marketing rather than the standard deviation of all the other providers.

Secondly, the major provider should not be considered as the base for NECA's favored rating methodology not because of its lack of interoperability, but lack of comprehensive data and insufficient pooling of deaf TRS users. NECA may understate the proposed rates for 2005-2006 although the issues on interoperability and the speed of answer capability need to be resolved. With NECA's proposed rates, I am afraid that it may lead to the restrictions and limitations on the optimization of the VRS use and the need to improve technology including E911.

I encourage FCC to establish an alternative rate in order to meet the possible growth of deaf users who may not be able to use VRS now but will plan later. I feel that right now we are in an "infancy" transition toward the VRS from the traditional TRS era.

Lastly, I would like to add my comment that we have the right to request for the data from all the providers including NECA since we pay the surcharge from our telephone bills for the universal service fund. I need your help to push the providers and NECA to open their information about the data on the Fund size and TRS fund to public.

Very truly yours,

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